1 Honorable Robert J. Bryan 2 3 4 5 6 7 IN THE UNITED STATE DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 10 GEORGE DC PARKER II and LORI A. PARKER. 11 NO. 3:23-cv-05069-RJB Plaintiffs, 12 SUPPLEMENTAL DECLARATION OF ٧. LOUISE DU CRAY IN SUPPORT OF 13 MOTION TO VACATE DEFAULT THE SOCIETY FOR CREATIVE ANACHRONISM, INC., a/k/a/ "SCA" or 14 "SCA, Inc.", et.al, 15 Defendants. 16 I, Louise Du Cray, am over the age of 21 and competent to testify to the facts contained 17 in this declaration under penalty of perjury under the laws of the State of Washington and 18 California. I declare and state as follows: 19 1. I was hired as VP of Corporate Operations-Elect for the Society of Creative 20 Anachronism (SCA) on June 1, 2021. I took over officially as VP of Corporate Operations (and 21 22 Secretary of the Corporation) on October 1, 2021. 23 2. SCA is a 501(c)(3) non-profit volunteer educational organization devoted to the 24 research and re-creation of pre-seventeenth century skills, arts, combat and culture by employing 25 SUPPLEMENTAL DECLARATION OF LOUISE DU PREG O'DONNELL & GILLETT PLLC CRAY IN SUPPORT OF MOTION TO VACATE 901 FIFTH AVE., SUITE 3400 DEFAULT - 1 SEATTLE, WASHINGTON 98164-2026

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knowledge of history to enrich the lives of participants through events, demonstrations and other educational activities.

- I have reviewed SCA's corporate records and files and have access to the same. I reviewed SCA's records related to George Parker and his exile from the Kingdom of An Tir ("Exile"), in particular the SCA Board's review of that decision. Upon the determination by the Crown of the Kingdom of An Tir that Mr. Parker was exiled, the decision was forwarded onto the SCA Board for review, per SCA policies. On May 25, 2021, I was present when the SCA Board evaluated the statements made by the Complainants, evaluated documentation provided to the Board, screenshots of the comments and conduct that were at issue, as well as the written statement of Mr. Parker. After review of the material, the SCA Board voted to uphold the exile of Mr. Parker from the Kingdom of An Tir. I have attached true and correct excerpts of the record related to the Exile as **Exhibit #1**.
- 4. On October 24, 2021, I was present for the meeting by the SCA Board that included considering the motion to revoke the membership of George Parker from SCA. At that meeting the SCA Board voted to revoke Mr. Parker's membership. In addition, I have reviewed the entire file the SCA maintained related to the Revocation of Membership and Denial of Participation ("R&D") for George Parker. I have attached true and correct excerpts of the record maintained by SCA related to the R&D of George Parker as **Exhibit #2**. At that same meeting the SCA Board considered and R&D for five other members who had their membership revoked as well.
- 5. The records of the SCA and my memory are in agreement that Mr. Parker was exiled, and his membership revoked, consistent with SCA policies in place at the time. This included giving Mr. Parker notice and an opportunity to provide his response during the appeal process.

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6. I am not aware of any documents related to Mr. Parker's exile or R&D maintained by the SCA that have been destroyed.

7. SCA maintains that the SCA followed its policies and procedures related to the SCA Board's review of the decision to Exile and then R&D Mr. Parker due to the comments in violation of SCA guidelines.

I declare under penalty of perjury and the laws of the State of Washington and California that the foregoing is true and correct.

DATED this 9th day of June, 2023, at Boulder Creek, California.

Louise du Cray

1 **DECLARATION OF SERVICE** 2 I hereby declare that on this day I electronically filed the foregoing document with the Clerk 3 of the Court using the CM/ECF system, which will send notification of such filing to the attorneys 4 of record listed below: 5 **Counsel for Plaintiffs George DC** Parker II and Lori A. Parker: 6 George DC Parker II Lori A. Parker 7 10710 199th Street East Graham, WA 98338 8 Via Messenger 9 Via Facsimile -X Via U.S. Mail, postage prepaid 10 Via Overnight Mail, postage prepaid X Via Court E-Service or email with recipient's approval 11 thenorsegypsyforge@gmail.com 12 DATED at Seattle, Washington, this 9th day of June, 2023. 13 /s/ Justin E. Bolster 14 Justin E. Bolster, WSBA #38198 15 16 17 18 19 20 21 22 23 24 25

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